

EXHIBIT A



Service of Process Transmittal Summary

TO: Tom Le
Experian
475 ANTON BLVD BLDG D
COSTA MESA, CA 92626-7037

RE: Process Served in New York

FOR: Experian Services Corp. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Michael Malcolm vs. Experian Information Solutions LLC
DOCUMENT(S) SERVED:	Attachment, Summons, Complaint, Verification
COURT/AGENCY:	Monroe County Supreme Court, NY Case # 2025190
NATURE OF ACTION:	Plaintiff relies on his credit rating for personal transaction
PROCESS SERVED ON:	C T Corporation System, New York, NY
DATE/METHOD OF SERVICE:	By Process Server on 02/04/2025 at 12:06
JURISDICTION SERVED:	New York
APPEARANCE OR ANSWER DUE:	Within 20 days after the service of this Summons (not counting the day of service itself) (Document(s) may contain additional answer dates)
ATTORNEY(S)/SENDER(S):	Michael Malcolm 45 Nisa Lane Apt 11 Rochester, NY 14606 585-305-7558
ACTION ITEMS:	CT has retained the current log, Retain Date: 02/05/2025, Expected Purge Date: 02/10/2025
	Image SOP
	Email Notification, April Williams april.williams@experian.com
	Email Notification, Francesca Di Iorio francesca.diiorio@experian.com
	Email Notification, Tom Le marina.velardi@experian.com
REGISTERED AGENT CONTACT:	C T Corporation System 28 Liberty Street New York, NY 10005 866-401-8252 LargeCorporationTeam@wolterskluwer.com



CT Corporation
Service of Process Notification
02/04/2025
CT Log Number 548341516

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date: Tue, Feb 4, 2025
Server Name: Pedro J Rodriguez

Entity Served	EXPERIAN SERVICES CORP.
Case Number	2025-190
Jurisdiction	NY

Inserts		





Jamie Romeo
County Clerk

Office of the County Clerk
MONROE COUNTY, NEW YORK

STATE OF NEW YORK

Supreme COURT
COUNTY OF MONROE

INDEX # 2025-190

Michael Malcolm PLAINTIFF

-VS-

FILED

JAN 23 2025

Monroe County Clerk's Office

DEFENDANT

Experian Services
- CORP.

ATTORNEY FOR PLAINTIFF:

ATTORNEY FOR DEFENDANT

NAME OF PAYOR:

RECEIPT

Supreme COURT,
MONROE COUNTY

ENDORSE THIS INDEX #
ON ALL PAPERS

Michael Malcolm PLAINTIFF

-VS-

Experian Services DEFENDANT
- CORP.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MonroeMichael Malcolm

Summons

Index No. 2025-190

Names of Plaintiff(s)/Petitioner(s)

Experian Services
CORP.

FILED

JAN 23 2025

Names of Defendant(s)/Respondent(s)

To the Person(s) Named as Defendant(s) Above:

Monroe County Clerk's Office

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff(s) herein and to serve a copy of your answer on the plaintiff(s) at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: 1/15 2025

(Date of Summons)

Michael Malcolm
(Plaintiff(s) name)45 Vista Lane Apt 1
(Plaintiff(s) street address)Rochester N.Y. 14606
(Plaintiff(s) city, state, zip)585-3057558
(Plaintiff(s) telephone number)Experian Services Corp
(Defendant(s) name)P.O. Box 9701
(Defendant(s) street address)Rochester, NY 14601-75013
(Defendant(s) city, state, zip)

Venue: Plaintiff(s) designate Monroe County as the place of trial. The basis of this designation is: (Enter County above, then select one category below, listing specific County)

 Plaintiff(s) Residence in Monroe County Defendant(s) Residence in _____ County Other (describe) _____

NOTE: THIS FORM OF SUMMONS MUST BE SERVED WITH A COMPLAINT

SUPREME COURT OF THE STATE OF NEW
YORK COUNTY OF Monroe

Michael Malcolm

FILED

JAN 23 2025

Monroe County Clerk's Office

Plaintiff,

Index No.

- against -

COMPLAINT

Defendant.

Experian INFORMATION SOLUTIONS LLC

x

TO THE SUPREME COURT OF THE STATE OF NEW YORK

The complaint of the plaintiff, Michael Malcolm respectfully shows and alleges as follows:

1. This is an action for actual, statutory, and punitive damages and cost brought pursuant to the Fair Credit Reporting Act (FCRA) 15USC1681et seq. jurisdiction

2. This is an action to enforce liability under the FCRA

3. This court has jurisdiction under 15USC1681P

4. This court has jurisdiction over defendant Experian Information Services, (Defendant)

PARTIES

5. Michael Malcolm ("Plaintiff") is an individual

6. Plaintiff is a natural person

7. Plaintiff is a resident of Monroe County NY

8. Plaintiff is a "consumer "as defined by 15USC1681a(c)

9. Plaintiff relies on his credit rating for personal transaction

10.Upon information and belief defendant principal office address as registered with the N.Y.

Secretary Of State is 475 Anton Blvd, Costa Mesa, C.A. 92626 USA

11. Upon information and belief, defendant registered agent is C.T. Corporation System at 28 Liberty St. New York N.Y. United States 10005

12. Defendant is a "Consumer Reporting Agency "as defined by 15USC1681a(f)

13. Upon information and belief defendant is an entity which, for monetary fees, dues, or subscription regular engages in whole or in part in the practice of assembling or evaluating consumer credit information Or other information on consumers for purposes of furnishing consumer report to third parties, and which uses any means or facility or interstate commerce for the purpose of preparing or furnishing consumer report.

14.Upon information and belief, defendant is a Consumer Reporting Agency that compiles and maintain files on Consumers on a nationwide basis as defined by 15USC1681a (P)

FACTS

15.Plaaintiffs disputed inaccurate child support information on his file on or around October 2021 defendant failed to re-investigate or delete the information from plaintiffs file but instead updated the information on November 7th, 2021.

16. Plaintiff again disputed the inaccurate child support information on his file on or around

April 2024. defendant failed to re-investigate or delete the information from plaintiff's file

But instead responded to plaintiff as verified on May 2nd, 2024

17. Plaintiff send Experian another dispute letter on August 5th 2024 disputing the same child support
inaccuracy. Experian received plaintiff dispute letter on August 9th 2024 at 1.17 pm, Refer to USPS
tracking number 9589 0710 5270 1486 1041 59. Experian did not re-investigate plaintiff dispute or
deleted the information from plaintiff's file

18. On sept 5th 2024 plaintiff again disputed the inaccurate child support information on his file
with proof of the receipt from the Department of Human Services (Child Support Enforcement
Unit) signed and dated by a notary public, that the account is paid in full. Defendant still refuse to
re-investigate the account or delete the inaccurate information from plaintiff's File. Refer to USPS
tracking number 9589 0710 5270 1575 8664 94

19. On 11/1/2024 plaintiff again disputed the inaccurate child support information on his file
showing proof that child support is not a CONSUMER CREDIT TRANSACTION and must not be
reported on plaintiff's file. see case law: KEVIN D MILLER VERSUS TRANS UNION LLC,

EXPERIAN INFORMATION SYSTEM INC AND SUPPORT KIDS INC. Experian still did not
re-investigate the account or delete the inaccurate information, but instead respond ACCURATE.

See USPS green return receipt dated November 6th, 2024, when Experian received my dispute letter

20. On 12/04/2024 plaintiff again send defendant a letter requesting the procedure defendant use to
verify the account as ACCURATE pursuant to 15USC1681i(6)(B)(iii), defendant fail to respond.
See USPS certified mail receipt tracking number 9589 0710 5270 1575 8739 35

21. Experian knew that certain definitions were added to the FCRA as a part of the 2003 amendments (FACT ACT) THAT CHILD SUPPORT IS NOT A CONSUMER CREDIT TRANSACTION AND MUDST NOT BE ON plaintiff's credit file.

22. Experian also knew from the case law that occurred on March 28th, 2007 Kevin D Miller versus Transunion LLC, Experian Information Systems and Support Kids Inc. That child support is not a consumer credit transaction and must not be furnished on plaintiff's credit file

23 Experian also knew from the case law that occurred on March 28th, 2007, KEVIN D. MILLER VERSUS TRANSUNION LLC, EXPERIAN INFORMATION SYSTEMS INC. AND SUPPORT KIDS INC. that the reporting of child support to plaintiff's file without a permissible purpose (written consent from plaintiff's) is a violation pursuant to 15USC 1681b (2)

24. Defendant intentionally failed to follow reasonable procedure to assure maximum possible accuracy of the information on a plaintiff's file. This is a violation of the Fair Credit Reporting Act. (FCRA). 15USC 1681(e)(b)

25. Defendant failed to exercise their grave responsibility with fairness, impartiality and a respect for the plaintiff's rights to privacy. This is a violation of the Fair Credit Reporting Act (FCRA) 15USC 1681(4)

26. Defendant failed to re- investigate plaintiff's dispute or verify or delete the account from plaintiff's file. This is a violation of The Fair Credit Reporting Act. (FCRA) 15USC 1681i (5).

27. Defendant failed to provide Plaintiff with the procedure used to verify the accuracy of the disputed information. This is a violation of The Fair Credit Reporting Act. (FCRA) 15USC 1681i(6)(B)(iii)

28. Defendant failed to respond to plaintiff within the 15 days required by law with all the requested information required by 15USC1681i(6)(B)(iii) This is a violation of the Fair Credit Reporting Act. (FCRA)15USC1681i (7).

29. Defendant failed to request the permissible purpose notice (written consent from the consumer) from the furnisher before placing the incorrect child support information on the plaintiff's file.

30. Plaintiff has had to spend money and incur costs for mailing correspondence to defendant.

31. Furthermore, plaintiff has been upset, distressed and worried about these issues with defendant.

32. Plaintiff has lost credit opportunities and been denied credit application due to the consumer report about him that is prepared maintained and published by Experian.

33. Plaintiff has lost his family due to the inaccurate erroneous child support information on his file

34. As a result of defendants conduct, action and inaction, plaintiff suffered damages by expended costs and expenses in dealing with these issues, loss of credit, loss of ability to purchase and benefit from credit and mental and emotional distress and anguish and humiliation and embarrassment of credit denials.

35. In the alternative, defendant conduct, action and/or inaction was willfully, rendering defendant liable for punitive damage in an amount to be determined by the court pursuant to 15USC 1681(n).

36. In the alternative, defendant conduct action and/ or inaction was negligent entitling plaintiff to recover under 15USC 1681(o).

37. Plaintiff is entitled to recover cost and attorneys' fees from defendant in an amount to be determine by the court pursuant to 15 USC 1681(n) and 15USC 1681 (o) wherefore, plaintiff

demand judgement in favor of plaintiff Michael Malcolm against defendant Experian information Services for said claims in the principal amount of \$ 100.000 for damages under the F.C.R.A.

Attached are exhibit A, dispute letters.

Attach are exhibits B, USPS certified mail receipt

Yours Truly

Michael Malcolm ("Plaintiff")

1/7/2025

VERIFICATION

State of New York
County of Monroe

Michael Malcolm, being duly sworn, deposes and says:

I am the Plaintiff in the above-entitled action. I have read the foregoing Complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters, I believe them to be true.

To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in Subsection (c) of Section 130-1.1 of the Rules of the Chief Administrative Judge (22 NYCRR).

Michael Malcolm
(sign your name in front of a Notary)
MICHAEL MALCOLM
(print your name)

Sworn to before me this 15th
day of January, 2025.

Karen M. Sappone
Notary Public

KAREN M. SAPPONE
NOTARY PUBLIC, STATE OF NEW YORK
No. 01SA8351688
QUALIFIED IN MONROE COUNTY
MY COMMISSION EXPIRES DEC. 12, 2028